

---

# ***OAR Box 1214***

*Prepped by Ollie Stewart*

---

*Document Number:*

**42) IV-D-8**

---

*Docket Number:*

**A-91-46**



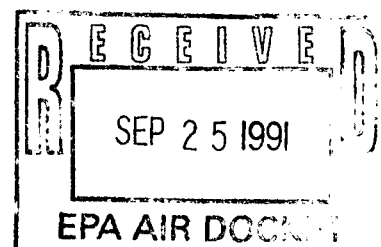
14700 Downey Avenue  
P.O. Box 1418  
Paramount, CA 90723  
(213) 531-2060

A-91-46

IV-D-08

September 19, 1991

Ms. Mary T. Smith  
Director Field Operations & Support Division (EN-397F)  
U.S. Environmental Protection Agency  
401 M Street S.W.  
Washington, D.C. 20460



Dear Ms. Smith,

As President and Chief Operating Officer of Paramount Petroleum, a small independent refinery, I believe it is my obligation to bring to your attention my views regarding the waiver sought by Ethyl Corporation for their HiTEC 3000 additive. With the implementation of the Clean Air Act and the extremely stringent regulations that will be imposed by California Air Resources Board on the refining industry in California. I strongly recommend that The Environmental Protection Agency grant Ethyl Corporation its waiver for the sale of HiTEC 3000 to be added to unleaded gasoline. If we are permitted to produce and add this additive to our gasoline pool, it will enhance the overall octane rating as well as reduce NOX emissions generated from the exhaust of automobiles. This will enable us to produce a gasoline that is lower in aromatics and also a cleaner burning fuel.

Please consider Ethyl Corporation's proposal carefully because I believe it will be an overall benefit for the Clean Air Act.

If you have any further questions, please call me at your convenience.

Sincerely,

A handwritten signature in cursive script, appearing to read 'Glenn C. Lingle'.

Glenn C. Lingle  
President/Chief Operating Officer

cc: Environmental Protection Agency  
Public Docket A-91-46  
Air Docket (LE-131)  
401 M Street S.W. Room M-1500  
Washington, D.C. 20460